

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

REGINALD CARRICK, individually and  
as Next Friend and Father of \_\_\_\_\_  
CARRICK, a minor,

Plaintiff,

vs.

JOSEPH MALLORY, individually;  
JOHN KEARNEY, individually;  
GEOFFREY SPEIGHT, individually;  
MICHAEL CLOUDT, individually;  
DAVID WOODS, individually; and  
DEKALB COUNTY GEORGIA,

Defendants.

CIVIL ACTION NO.  
1:16-CV-2997-AT

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**PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

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Plaintiff Reginald Carrick, in his individual and representative capacities, files this Motion for Partial Summary Judgment in accordance with Rule 56 of the Federal Rules of Civil Procedure and Local Rule 56.1 on the grounds that there are no genuine issues of material fact relating to the issue of the individual Defendants' liability under 42 U.S.C. § 1983, such that Plaintiff is entitled to

judgment as a matter of law on Count I of the Amended Complaint. In support of this motion, Plaintiff relies on the attached Statement of Undisputed Material Facts, Plaintiff's Memorandum of Law in Support of His Motion for Partial Summary Judgment (along with the Exhibits attached thereto), and the evidence of record filed with the Court.

Respectfully submitted,

**Hall Hirsh Hughes, LLC**

By: s/ David R. Hughes

David R. Hughes

Ga. Bar No. 375615

Attorney for Plaintiff

150 East Ponce de Leon Avenue, Suite 450  
Decatur, Georgia 30030  
404-638-5880  
[david@h3-law.com](mailto:david@h3-law.com)

**CERTIFICATE OF SERVICE AND LOCAL RULE 5.1 COMPLIANCE**

The undersigned hereby certifies that the foregoing document has been prepared in Times New Roman font, 14-point in accordance with N.D.Ga.L.R. 5.1(C) and electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to the following attorney of record:

Aaron J. Ross, Esq.  
Elizabeth L. Fite, Esq.  
DeKalb County Law Department  
1300 Commerce Drive, 5<sup>th</sup> Floor  
Decatur, GA 30030

This 6th day of September, 2016.

Respectfully submitted,

**Hall Hirsh Hughes, LLC**

By: s/ David R. Hughes  
DAVID R. HUGHES  
Ga. Bar No. 375615  
Attorney for Plaintiff

150 East Ponce de Leon Avenue, Suite 450  
Decatur, GA 30030  
404-638-5883  
david@h3-law.com

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Plaintiff Reginald Carrick, in his individual and representative capacities, files this Motion for Partial Summary Judgment in accordance with Rule 56 of the Federal Rules of Civil Procedure and Local Rule 56.1 on the grounds that there are no genuine issues of material fact relating to the issue of the individual Defendants' liability under 42 U.S.C. § 1983, such that Plaintiff is entitled to

judgment as a matter of law on Count I of the Amended Complaint. In support of this motion, Plaintiff relies on the attached Statement of Undisputed Material Facts, Plaintiff's Memorandum of Law in Support of His Motion for Partial Summary Judgment (along with the Exhibits attached thereto), and the evidence of record filed with the Court.

Respectfully submitted,

**Hall Hirsh Hughes, LLC**

By: s/ David R. Hughes

David R. Hughes

Ga. Bar No. 375615

Attorney for Plaintiff

150 East Ponce de Leon Avenue, Suite 450  
Decatur, Georgia 30030  
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Aaron J. Ross, Esq.  
Elizabeth L. Fite, Esq.  
DeKalb County Law Department  
1300 Commerce Drive, 5<sup>th</sup> Floor  
Decatur, GA 30030

This 7th day of August, 2017.

Respectfully submitted,

**Hall Hirsh Hughes, LLC**

By: s/ David R. Hughes

DAVID R. HUGHES  
Ga. Bar No. 375615  
Attorney for Plaintiff

150 East Ponce de Leon Avenue, Suite 450  
Decatur, GA 30030  
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**PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

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Plaintiff Reginald Carrick, in his individual and representative capacities, files this Motion for Partial Summary Judgment in accordance with Rule 56 of the Federal Rules of Civil Procedure and Local Rule 56.1 on the grounds that there are no genuine issues of material fact relating to the issue of the individual Defendants' liability under 42 U.S.C. § 1983, such that Plaintiff is entitled to

judgment as a matter of law on Count I of the Amended Complaint. In support of this motion, Plaintiff relies on the attached Statement of Undisputed Material Facts, Plaintiff's Memorandum of Law in Support of His Motion for Partial Summary Judgment (along with the Exhibits attached thereto), and the evidence of record filed with the Court.

Respectfully submitted,

**Hall Hirsh Hughes, LLC**

By: s/ David R. Hughes

David R. Hughes

Ga. Bar No. 375615

Attorney for Plaintiff

150 East Ponce de Leon Avenue, Suite 450  
Decatur, Georgia 30030  
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1300 Commerce Drive, 5<sup>th</sup> Floor  
Decatur, GA 30030

This 7th day of August, 2017.

Respectfully submitted,

**Hall Hirsh Hughes, LLC**

By: s/ David R. Hughes  
DAVID R. HUGHES  
Ga. Bar No. 375615  
Attorney for Plaintiff

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